

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALMA LASERS, INC.

Plaintiff/Counter-Defendant,

v.

YAN MICHAEL LI, and MINIMALLY
INVASIVE BRAIN AND SPINE
INSTITUTE, LLC,

Defendants/Counter-Plaintiffs.

Case No.: 25-cv-4390

District Judge: Hon. Rebecca R. Pallmeyer

Magistrate Judge: Hon. Jeannice W.
Appenteng

**MOTION FOR ENTRY OF FINAL JUDGMENT
OF SUM CERTAIN AGAINST DEFENDANTS**

Plaintiff Alma Lasers, Inc. (“Alma Lasers”), through its counsel Troutman Pepper Locke LLP, pursuant to Federal Rule of Civil Procedure 55 and this Court’s November 21, 2025 Order, hereby files its Motion for Entry of Final Judgment of Sum Certain as of December 22, 2025 against Yan Michael Li (“Dr. Li”) and Minimally Invasive Brain and Spine Institute, LLC (“MIBSI”, together with Dr. Li, “Defendants”). In support of this request, Alma Lasers states as follows:

1. Alma Lasers initiated this action to recover from Defendants money due and owed in connection with a certain purchase order (“Purchase Order”) entered into by Alma Lasers and Defendants for the purchase of cosmetic laser and plasma equipment (the “Equipment”) and which provided the terms of sale of the Equipment. Alma Lasers and Dr. Li (acting on behalf of Defendants) executed the Purchase Order on or around October 18, 2024. (ECF 21-1; A. Greer Dec., ¶ 4 attached hereto as Exhibit 1 (hereinafter “Greer Dec.”).)

2. Pursuant to the Purchase Order, Alma Lasers was to provide Dr. Li with the Equipment and in exchange Defendants were to pay the quoted purchase price. (ECF 21-2; Greer Dec. ¶¶ 4-5; Greer Dec. Ex. A.)

3. The purchase price for the Equipment, with tax and shipping, was \$240,856.26. (ECF 21-2; Greer Dec. ¶ 5; Greer Dec. Ex. A.) At the time the Purchase Order was executed, Dr. Li paid to Alma Lasers a deposit in the amount of \$22,000, leaving an unpaid balance totaling \$218,856.26. (ECF 21-1; Greer Dec. ¶¶ 5-6; Greer Dec. Exs. A, B.)

4. Alma Lasers delivered the Equipment to Defendants' San Antonio clinic, located at 4910 Golden Quail, Suite #170, San Antonio, TX 78240, on or around October 31, 2024. (ECF 21 ¶ 9; Greer Dec. ¶ 7.) The Equipment conformed in all respects to the Purchase Order specifications and was in good working order. (Greer Dec. ¶ 8.)

5. For amounts invoiced to Defendants, Alma Lasers requested payment be made by November 24, 2024. (Greer Dec. ¶ 6.) Under the terms of the Purchase Order, interest on amounts more than 30 days past due accrues at a rate of 18% per annum. (ECF 21-1 ¶ 1; Greer Dec. ¶ 10.)

6. Apart from the initial deposit of \$22,000 paid at the time the Purchase Order was executed, Defendants have refused to pay the balance owed, which currently totals \$218,856.26. (ECF 21 ¶¶ 12-13; Greer Dec. ¶ 9.)

7. As of December 22, 2025, the amount of unpaid interest totals \$39,178.27. (Greer Dec. ¶ 11.)

8. Additionally, the Purchase Order provides that Defendants will "reimburse Alma [Lasers] for its costs of collection of any past-due payments, including applicable court costs and attorneys' fees." (Greer Dec. ¶ 12.) As of December 22, 2025, Alma Lasers has incurred

\$85,458.06 in attorneys' fees and costs in attempting to collect this outstanding balance. (Greer Dec. ¶ 13; Greer Dec. Ex. C.)

9. Alma Lasers filed a state court Complaint in Cook County on March 18, 2025 and Dr. Li removed this matter to this Court on April 22, 2025. (ECF 1.) Alma Lasers filed its First Amended Complaint on July 29, 2025, naming both Dr. Li and MIBSI as defendants. (ECF 21). On August 8, 2025, Defendants filed an Answer, in which they asserted affirmative defenses and counterclaims. (ECF 27.) Alma Lasers timely filed an answer to Defendants' counterclaims on August 22, 2025. (ECF 30.)

10. On September 22, 2025, counsel for Defendants, Alexander Loftus, moved to withdraw as counsel. (ECF 32.) This Court entered and continued the motion for withdrawal on September 23, 2025, and directed Defendants either to object to the motion for withdrawal or to file appearances through new counsel on or before November 3, 2025. (ECF 33.) The Court cautioned that "[f]ailure to take one of these steps will result in an order of default and dismissal of the counterclaims." (*Id.*) The Court also mailed a copy of the September 23, 2025 Order to Defendants.

11. Defendants failed to file appearances on or before November 3, 2025.

12. Accordingly on November 21, 2025, this Court (1) granted Mr. Loftus' motion to withdraw; and (2) entered an order of default against Defendants. (ECF 36.)

13. The Court's November 21, 2025 Order also directed Alma Lasers to submit the present motion for Entry of Final Judgment for Sum Certain as of December 22, 2025. A proposed order granting the same is attached hereto as Exhibit 2.

WHEREFORE, Plaintiff Alma Lasers, Inc. respectfully requests that this Court:

(1) Enter judgment in favor of Alma Lasers and against Defendants in the amount of \$263,862.70 for:

- (a) unpaid amounts for purchase price of the Equipment of \$218,856.26;
- (b) interest of \$39,178.27 accrued as of December 22, 2025;
- (c) further interest at an annual rate of 18% accruing from December 22, 2025;
- (d) reasonable attorneys' fees and costs incurred by Alma Lasers, Inc. to enforce this order; and
- (e) such other relief that the Court deems just and appropriate.

(2) Dismiss all claims asserted by Defendants against Alma Lasers with prejudice.

Dated: December 12, 2025

ALMA LASERS, INC.

/s/ Brandon Calderón

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CERTIFICATION OF SERVICE

I, the undersigned attorney, certify that this 12th day of December 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Pursuant to Fed. R. Civ. P. 5 and the Northern District of Illinois LR 5.9, I have electronically served copies on all Filing Users and have mailed a copy to the below defendants.

Dr. Yan Michael Li
7601 W. Sam Houston Pkwy S., Ste. 300
Houston, TX 77072

**Minimally Invasive Brain and
Spine Institute, LLC**
4910 Golden Quail, # 170
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/s/ *Brandon Calderón*
Brandon Calderón